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April 01, 2005

Office of Nutritional Products
Labeling & Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Re: Notification of Dietary Supplement Statements

Dear Sir or Madam:

This letter is to notify you that Garden of Life, Inc. wishes to use a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act in a product label and/or labeling.

Manufacturer/Packer/Distributor Name and Address:

Garden of Life, Inc.
5500 N. Village Blvd.
Suite 202
West Palm Beach, FL 33407

Brand Name: Garden of Life

Product Name: Clear Energy®

Statement(s):

- Preliminary research suggests that the Rhodiola rosea in Clear Energy supports healthy response to stress
- Clear Energy expands on the adaptogenic affect by including other ingredients to support mental and physical endurance.
- The Rhodiola rosea in Clear Energy supports physical and mental endurance
- While most energy formulas focus on providing energy for the body, Clear Energy is designed to invigorate both the body and the mind with adaptogenic botanicals.
- Clear Energy contains adaptogens such as Rhodiola rosea that work differently than stimulants. Rather than directly stimulating the body, adaptogens help you achieve a more balanced response to physical, environmental and chemical stress.
- Adaptogenic herbs are rare species whose properties are effective in supporting healthy response to stress.

I hereby certify that the information contained in this notice is complete and accurate, and that Garden of Life, Inc. has substantiation that the statement(s) indicated above are truthful and not misleading.

By:

Dr. Leonid Ber

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Title: Director, Medical Research

If you have any questions, please contact Dr. Leonid Ber, Director, Medical Research at 561-748-2477.